



U.S. Department of Justice

United States Attorney
Southern District of New YorkRECEIVED
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86 Chambers Street, 4th Floor
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August 24, 2006

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BY HAND

Honorable Shira A. Scheindlin
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1050
New York, New York 10007

Javed v. U.S. Dep't of Homeland Security
06 Civ. 1682 (SAS)

Dear Judge Scheindlin:

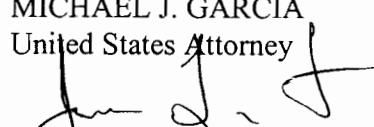
I am writing respectfully to request a 15-day extension of time – to September 6, 2006 – for the Government to file a dispositive motion with respect to the complaint in the above-referenced mandamus action, in which plaintiffs Saleem and Iris Javed seek, *inter alia*, to compel United States Citizenship and Immigration Services (“CIS”) to adjudicate Saleem’s motion to reopen his unsuccessful application for a discretionary adjustment of his immigration status to that of a lawful permanent resident. The CIS has indicated that is willing to resolve this action by referring Saleem’s adjustment application to an Immigration Judge for consideration in administrative removal proceedings, and that it expects to make that referral shortly.

Plaintiffs’ counsel, Adam Paskoff, Esq., has consented to the requested adjournment. I thank the Court for its consideration of this request.

Respectfully,

MICHAEL J. GARCIA
United States Attorney

By:


F. JAMES LOPREST, JR.
Special Assistant United States Attorney
Tel. No.: (212) 637-2728

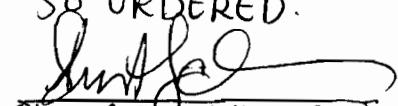
cc: BY TELEFACSIMILE
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Adam Paskoff, Esq.
Paskoff & Tambler, LLP
225 West 34th Street, Suite 1504
New York, NY 10122

The Government’s request is hereby granted. The time for the Government to file a dispositive motion in this case is extended to September 6, 2006.

Dated: New York, NY
August 25, 2006

SO ORDERED:


Shira A. Scheindlin, US DJ